FILED IN OPEN COURT U.S.D.C. Atlanta

MAY 25 2018

James N. Hatten, Clerk By: Deputy Clerk

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

SRIGINAL

**ERROL BUGGS** 

Criminal Information

No. 1:18-CR-185

THE U.S. ATTORNEY CHARGES THAT:

18 U.S.C. § 1343

(Wire Fraud)

On or about May 9, 2016, in the Northern District of Georgia and elsewhere, defendant ERROL BUGGS, having devised a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing the scheme and artifice to defraud, did cause to be transmitted by means of wire communication in interstate and foreign commerce any writings, signs, signals, pictures, and sounds, to wit, a wire transfer of \$49,478.78 from Honeywell Process Solutions in Woodstock, Canada to a bank account in the Northern District of Georgia, on the fraudulent pretense that the \$49,478.78 was owed to a vendor, Tredd, LLC, which was in fact a shell company created by defendant BUGGS in furtherance of the scheme, in violation of 18 U.S.C. § 1343.

## **Forfeiture Provision**

- 1. As a result of committing one or more of the offense alleged in this Information, the defendant, ERROLL BUGGS, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 18, United States Code, Section 982(a)(2); and Title 28, United States Code, Section 2461, all property, real and personal, constituting or derived from proceeds traceable to the offenses.
- 2. As a result of committing one or more of the offenses alleged in this Information, the defendant, ERROLL BUGGS, shall forfeit to the United States pursuant to Title 18, United States Code, Section 1029(c)(1)(C), all personal property used or intended to be used to commit the offenses.
- 3. If, as a result of any act or omission of the defendant, any property subject to forfeiture:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 18, United States Code, Section 982(b)(1); Title 21, United States Code, Section 853(p); and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

BYUNG J. PAK

United States Attorney

BRIAN M. PEARCE

Assistant United States Attorney

Georgia Bar No. 568768

600 U.S. Courthouse

75 Spring Street, S.W.

Atlanta, GA 30303

404-581-6000; Fax: 404-581-6181